

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
DEC 20 2022  
SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

2:22-CR-173-TOR

**Plaintiff,**

## INDICTMENT

V.

## ANDRE PIERRE PICARD.

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(C)  
Distribution of Heroin  
(Count 1)

## Defendants.

21 U.S.C. § 841(a)(1),  
(b)(1)(C)  
Distribution of  
Methamphetamine  
(Counts 2, 4)

21 U.S.C. § 841(a)(1),  
(b)(1)(C)  
Distribution of Fentanyl  
(Counts 3, 5-6)

21 U.S.C. § 853  
Forfeiture Allegations

### The Grand Jury charges:

COUNT 1

On or about April 28, 2020, in the Eastern District of Washington, the Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a

1 mixture or substance containing a detectable amount of heroin, a Schedule I  
2 controlled substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

3 COUNT 2

4 On or about April 14, 2022, in the Eastern District of Washington, the  
5 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a  
6 mixture or substance containing a detectable amount of methamphetamine, a  
7 Schedule II controlled substance, all in violation of 21 U.S.C. § 841(a)(1),  
8 (b)(1)(C).

9 COUNT 3

10 On or about April 14, 2022, in the Eastern District of Washington, the  
11 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a  
12 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
13 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled  
14 substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

15 COUNT 4

16 On or about May 4, 2022, in the Eastern District of Washington, the  
17 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a  
18 mixture or substance containing a detectable amount of methamphetamine, a  
19 Schedule II controlled substance, all in violation of 21 U.S.C. § 841(a)(1),  
20 (b)(1)(C).

21 COUNT 5

22 On or about May 4, 2022, in the Eastern District of Washington, the  
23 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a  
24 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
25 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled  
26 substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

1 COUNT 6

2 On or about December 7, 2022, in the Eastern District of Washington, the  
3 Defendant, ANDRE PIERRE PICARD, knowingly and intentionally distributed a  
4 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-  
5 phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled  
6 substance, all in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

7 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

8 The allegations contained in this Indictment are hereby re-alleged and  
9 incorporated by reference for the purpose of alleging forfeitures.

10 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of  
11 21 U.S.C. §§ 841(b)(1)(C), as set forth in this Indictment, the Defendant, ANDRE  
12 PIERRE PICARD, shall forfeit to the United States of America, any property  
13 constituting, or derived from, any proceeds obtained, directly or indirectly, as the  
14 result of such offense(s) and any property used or intended to be used, in any  
15 manner or part, to commit or to facilitate the commission of the offense(s).

16 If any forfeitable property, as a result of any act or omission of the  
17 Defendant(s):

18 (a) cannot be located upon the exercise of due diligence;  
19 (b) has been transferred or sold to, or deposited with, a third party;  
20 (c) has been placed beyond the jurisdiction of the court;  
21 (d) has been substantially diminished in value; or  
22 (e) has been commingled with other property which cannot be divided  
23 without difficulty,

24 //

25 //

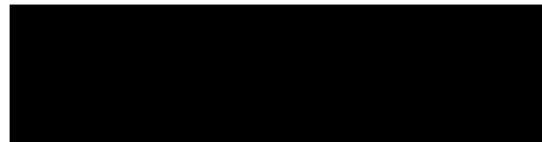
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1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).

3  
4 DATED this 20 day of December, 2022.

5 A TRUE BILL  
6  
7  
8



9 Vanessa Waldref  
10 Vanessa R. Waldref  
11 United States Attorney

12 Richard R. Barker  
13 Richard R. Barker  
14 Assistant United States Attorney